



**STATE OF OHIO**  
**OFFICE OF THE ATTORNEY GENERAL**  
JIM PETRO, ATTORNEY GENERAL

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180 E. Broad St., 9th Fl.  
Columbus, OH 43215  
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August 18, 2003

Marlene H. Dortch, Secretary  
FCC  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: *In the Matter of Lifeline and Link-  
Up*, WC Docket 03-109, CC Docket 96-45

Dear Secretary Dortch:

The Public Utilities Commission timely filed comments in the above-referenced proceeding via the electronic filing system on August 18, 2003. Included in this filing are the comments with the complete studies attached.

Sincerely,

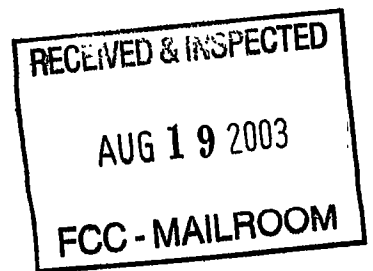
A handwritten signature in cursive script that reads "Jodi J. Bair".

**Jodi J. Bair**  
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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**



In the Matter of	)	
	)	WC Docket No. 03-109
Lifeline and Link-Up	)	CC Docket No. 96-45

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**COMMENTS OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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**INTRODUCTION AND BACKGROUND**

On June 9, 2003, the Federal Communications Commission (FCC) released a Notice of Proposed Rulemaking (NPRM) in WC Docket No. 03-109 (In the Matter of Lifeline and Link-Up). The FCC's NPRM seeks comment on the *Recommended Decision* of the Federal-State Joint Board on Universal Service (Joint Board) regarding modifications to the Lifeline and Link-Up programs. In its *Recommended Decision*, the Joint Board suggested that the FCC expand the default federal eligibility criteria to include an income-based criterion and additional means-tested programs. In addition, the Joint Board recommended that the FCC require states, under certain circumstances, to adopt verification procedures. To more effectively target low-income consumers, the Joint Board recommended that the FCC provide outreach guidelines for the Lifeline/Link-Up program. The FCC requests more information concerning the reasons for differences in low-income penetration rates over time and among states. The Joint Board further recommended that the FCC seek comment on whether it would be possible to modify the Link-

Up program to directly address barriers posed by outstanding unpaid balances for local and long distance services.

Comments in this proceeding are due at the FCC on August 18, 2003. The Public Utilities Commission of Ohio (PUCO or Ohio Commission) hereby submits its comments in response to the FCC's NPRM in the above-captioned proceeding.

## **DISCUSSION**

### **Income Eligibility and Self Certification**

The FCC requests comments regarding proposed amendment to its income eligibility and self certification requirements. NPRM at ¶ 2.

The Ohio Commission's SBC/Ameritech merger settlement required the Company to conduct research in order to determine how best to decrease the non-telephone households in Ameritech Ohio's service territory. *In the Matter of the Joint Application of SBC Communications Inc., SBC Delaware Inc., Ameritech Corporation, and Ameritech Ohio for Consent and Approval of a Change of Control*, Case No. 98-1082-TP-AMT. Ameritech Ohio was required to complete the study to determine the various causes of non-telephone households in Ameritech Ohio's current service territory. The research demonstrated that adding an income-based eligibility criterion to Ameritech's USA program would be one of the most effective ways to decrease the number of non-telephone households in the Ameritech service territory.

Ameritech hired a consultant, Wirthlin Worldwide ("Wirthlin"), to perform the required research. The study was conducted in two phases. Phase I of the study was qualitative, employing focus groups. Phase II was quantitative and used one-on-one interviews for the

administration of a survey instrument.<sup>1</sup> Wirthlin identified the following research results as key findings regarding implementation of an income eligibility criteria:

- Those who said that they would qualify for either USA plan tend to have resistance to receiving assistance and applying for financial help.
- 70% of the participants were either extremely interested or very interested in signing up for either USA plan if they were eligible based on income.
- 75% of the participants would be willing to show proof of their total annual income for verification purposes.

*Id.*, Non-Phone Quantitative Study, Final Report, Wirthlin Worldwide, December, 2000 at 74-86, 104-108 (May 7, 2001).

Wirthlin's report stated that the USA Plans are underutilized, due primarily to a lack of awareness of them (*Id.* at 79), and suggested the following approaches to decreasing the incidence of phonelessness:

- Increase communication of the USA plans primarily through targeted direct mail and television as well as through local newspapers and social service agency distribution.
- Low-income assistance -- an income-based eligibility provision to boost participation among non-plan qualifiers.
- Use an application process that minimizes the appearance of receiving financial aid, is simple to apply for, and reinforces the feeling that privacy will be protected.

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<sup>1</sup> Excerpts from the study are attached in electronic form. The complete SBC study is attached in hard copy as Attachment A.

- The assistance offer should be communicated as implying that the reader is likely to qualify for the discount.
- Dispel misperceptions about the need to pay off outstanding long distance balances, having to pay for installation, or making a deposit (if no long distance is requested).

*Id.* at 8.

The Wirthlin research identified income-based eligibility as a valuable method for decreasing the number of non-telephone households in Ameritech Ohio's service territory. *Id.* at 104-105.

The Ameritech-sponsored research indicated that the working poor make up the majority of those who are currently without a telephone. Moreover, the quantitative study results support the fact that the working poor are being harmed by the lack of an income eligibility criterion. Of the 343 people interviewed for the study, 60% are employed but are still without telephone service. *Id.* at 115. Of those 60%, 41% are employed full-time. *Id.* The study results clearly indicate that even though a consumer has a full time job, she or he may not have enough money to have telephone service. Every effort should be made to reach out to this population. An income-based eligibility criterion will help to make basic telephone service affordable for the working poor and providing telephone service to the working poor will significantly reduce the number of non-telephone households.

Eligibility based solely on participation in one or more specified means-tested programs excludes families that are low-income but not receiving government assistance. The results of the study conducted by Wirthlin provides definite evidence that an income-based criterion was needed in Ohio. There were 70% of the survey respondents who were either extremely interested or very interested in signing up for either USA plan if they were eligible based on low

income. *Id.* at 104-105. Three out of four (76%) consumers surveyed by Wirthlin were willing to show proof of total annual income in order to verify their low-income status. *Id.* at 106-108.

As mentioned previously, Wirthlin recommended that basing lifeline eligibility on income would decrease the number of phoneless households in Ameritech Ohio's service territory. Its recommendation was based entirely on the research results which found that one of the causes of phonelessness in Ameritech Ohio's territory is that some people do not participate in assistance programs but still cannot afford telephone service.

A similar commitment was required as a part of the Bell Atlantic Corporation and GTE Corporation (herein Verizon North) merger. *In the Matter of the Joint Application of Bell Atlantic Corporation and GTE Corporation for Consent and Approval of a Change in Control*, Case No. 98-1398-TP-AMT (Opinion and Order) (February 10, 2000). The company was required to carry out a commitment to study the causes for non-telephone households in Verizon North's service area.<sup>2</sup> *Id.* A copy of the study is attached. *Id.* The company was also required to develop short- and long-term practices and policies designed to decrease the number of non-telephone households in Verizon North's incumbent Ohio service territory.

On February 6, 2003, Verizon North filed its Ohio non-telephone subscriber study. The study was performed and presented by Wirthlin Worldwide in June 2001. The survey was administered to 372 people through personal interviews. None of the persons interviewed were homeless and all did not have a telephone in their homes. Of the households without telephones, there were 39% of the households in which a person was employed. *Id.* at 9. Under the current

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<sup>2</sup> Excerpts of the Verizon study are attached for electronic filing. The complete study is attached in hard copy as Attachment B.

requirements (participation in a qualifying program), there were 58% of the respondents who reported that they would qualify for the Lifeline program and 39% who indicated that they would not qualify. *Id.* at 73. There were 71% of the respondents who reported that they would be extremely or very interested in the Lifeline program.

The respondents were asked whether they would participate in the Lifeline program if they were not participating in a qualifying program but could qualify for Lifeline through a low-income criteria. There were 69% of the respondents who reported that they would participate. *Id.* at 89. Of those who would participate through an income eligibility criteria, 62% of these respondents indicated that they would be willing to send verification of their income to the phone company. *Id.* at 90. The report reflects that 44 percent of the respondents had an annual income level under \$5,000 and 38 percent had an income level of \$5,000-\$12,525. *Id.* at 24.

Wirthlin arrived at the following conclusions in their report of the study:

*This study has indicated that if the Lifeline Plan is successfully communicated and implemented that as many as 44% of the phoneless market in the Verizon Ohio territory would be interested in the Plan and would participate. As the chart below indicates, by adding the low-income provision (and factoring in those who would verify their income) to the Plan, participation could rise to 59% of the market.*

*Id.* at 99. These non-telephone household studies offer compelling evidence that an income-based, eligibility criteria will have a positive effect in reducing the number of non-telephone households. The Ohio Commission was significantly influenced by the results of the studies, and has incorporated the 150% income eligibility criteria into the Lifeline Program it has adopted as a commitment in Ohio's Elective Alternative Regulation Rules. *In the Matter of the Commission Ordered Investigation of an Elective Alternative Regulatory Framework for Incumbent Local*

*Exchange Companies*, Case No. 00-1532-TP-ALT (Entry on Rehearing) (April 25, 2002), Ohio Admin. Code § 4901:1-4-05) (West 2003) (Attachment C). The Ohio Commission also adopted a rule which enumerates that all ILECs must use self-certification to enroll customers onto Lifeline assistance who qualify through household income-based requirements. *Id.* Finally, the Ohio Commission adopted a rule permitting an ILEC to perform a verification audit of a customer applying for or a customer already on Lifeline assistance service. *Id.* The Ohio Commission has left it to the Company's discretion as to when and how it would conduct such an audit.

#### **Promotion of the Lifeline Program and Outreach Guidelines**

The FCC invites comments concerning the reasons for varying penetration levels amount the states for Lifeline and Link-Up programs. NPRM at ¶ 2.

The Lifeline program should include a marketing budget to promote the program and work with an advisory board to design outreach guidelines and an educational and promotional program.

The Ameritech non-telephone household study found that of those people in Ameritech Ohio's service territory without telephones, only 14% were aware of USA Plan 1 (state plan) and only 10% were aware of Plan 2 (federal plan). In the Verizon study, 15% of the respondents without telephones were aware of a special service for low-income people. In order to increase the effectiveness of the lifeline and line-up programs, a piece of the budget must focus strongly on awareness.



### **60-Day Notification Requirement**

The FCC seeks comment on the Joint Board's recommendation to establish a rule that would require carriers to provide at least 60 days notice before discontinuing a customer's Lifeline benefits, in those instances where the carrier has determined that the customer is no longer eligible for the program.<sup>3</sup> NPRM at ¶ 2. The Ohio Commission supports the adoption of a 60-day notification requirement, and further suggests that such a requirement should be standard practice whenever a carrier seeks to terminate a customer's Lifeline benefits, regardless of the carrier's rationale.

The PUCO suggests that there may be other carrier-initiated circumstances that may result in a customer's termination of Lifeline benefits, including, a carrier's decision not to renew its ETC certification, or a reseller's business decision to cease providing the Lifeline or Link-Up programs. In any case, the response time that a 60-day notification requirement would provide may well be a critical factor in minimizing the impact that the carrier's decision would have on a low-income households.

### **Income-Based Criterion**

The FCC's NPRM seeks comment on, the Joint Board's proposal to expand the eligibility criteria for the Lifeline and Link-Up programs by adding an income-based criterion. The Joint Board suggests that low-income households at or below 135% of the Federal Poverty Guidelines

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<sup>3</sup> The Ohio Commission does not recommend a 60-day notice for those discontinued from Lifeline and Link-Up benefits for reasons such as fraud or deception.

(FPG) should qualify for Lifeline and Link-Up absent participation in any other means-tested qualifying programs. NPRM at ¶ 1. The Ohio Commission supports the adoption of a 150% income-based criterion, consistent with the Ohio Commission's recommendation in its previously-filed comments to the Joint Board submitted in December 2001 in the FCC's Universal Service docket. *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45 (Ohio Commission Comments) (January 2, 2002). In those comments, the PUCO stated that the inclusion of such a criterion would not only increase Lifeline subscribership, but would benefit one of the most underserved subsets of the low-income population -- the working poor.

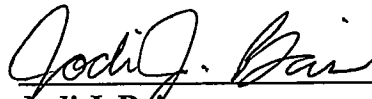
The PUCO supports the adoption of a 150% FPG income-based criterion. Ohio currently utilizes this threshold and finds it effective in capturing more households that qualify as elderly or fall into the working poor category. If the FCC chooses not to adopt the 150% criterion, then the threshold should be, at a minimum, 135% FPG. Should the FCC go with the minimum of 135%, the states that are already utilizing the 150% must be grandfathered, in that they should continue to maintain the full amount of federal Lifeline and Link-Up support that they currently receive. This approach is supported by the fact that the Joint Board's estimated cost-benefit analysis regarding the adoption of such a proposal included an assumption that those states already utilizing a 150% income-based criterion would continue to do so.

**CONCLUSION**

The Ohio Commission respectfully requests the FCC to adopt the recommendations made in these comments.

Respectfully submitted,

**On Behalf of The Public Utilities  
Commission of Ohio**

A handwritten signature in cursive script, reading "Jodi J. Bair", is written over a horizontal line.

**Jodi J. Bair  
Assistant Attorney General**

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Dated: August 18, 2003

150 East Gay Street  
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Ameritech



FILE

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PUCO

May 7, 2001

Daisy Crockron, Chief  
Docketing Division  
Public Utilities Commission of Ohio  
180 E. Broad St., 10th Flr.  
Columbus, OH 43215-3793

RE: Ameritech Ohio  
Case No. 98-1082-TP-AMT

Dear Ms. Crockron:

Ameritech Ohio hereby issues its report as to the practices and policies it has elected to implement regarding non-telephone household studies. A certificate of service accompanies this filing.

Please contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,

*Mary Ryan Fenlon*

Mary Ryan Fenlon

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business  
Technician bmc Date Processed 5/7/01

Attachment A

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Application )  
of SBC Communications Inc., SBC )  
Delaware, Inc., Ameritech Corporation, )  
and Ameritech Ohio )  
for Consent and Approval )  
of a Change of Control. )

Case No. 98-1082-TP-AMT

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**AMERITECH OHIO'S REPORT**

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**I. Introduction**

Ameritech Ohio, by its attorneys, submits this report as called for in the Stipulation and Recommendation adopted by the Commission in the captioned case on April 8, 1999. Section VI.B of the Stipulation and Recommendation provides that Ameritech Ohio shall maintain the USA (Lifeline) program as described in its Alternative Regulation Plan until at least January 9, 2002. Section VIII.C provides as follows:

Non-Telephone Households Studies. Commencing within 3 months following the Merger Closing Date and ending within 15 months following such commencement date, Ameritech Ohio will complete a series of studies to determine the various causes of non-telephone households in Ameritech Ohio's current service territory. This research will be conducted by Ameritech Ohio in conjunction with the substantial involvement of the Commission Staff, OCC, Edgemont, and any other consumer group that is a Supporting Stipulating Party, which involvement will begin within 30 days following the Merger Closing Date. Upon request of a consumer group that is a Supporting Stipulating Party, Ameritech Ohio will pay up to \$5,000 in total to one or more such groups for their use in obtaining an expert or experts to assist in the preparation, review, and analysis of this non-telephone household research. The studies will be designed to identify valid findings and conclusions as to the causes of non-telephone households in Ameritech Ohio's current service territory. Once the reasons for non-telephone households have been identified, Ameritech Ohio, in conjunction

with the Commission Staff, OCC, Edgemont, and any other consumer group that is a Supporting Stipulating Party will develop potential short and long-term practices and policies designed to decrease the number of non-telephone households in Ameritech Ohio's current service territory. Ameritech Ohio will file a report with the Commission within 30 days after the conclusion of such studies as to those practices or policies it has elected to implement.

In fulfillment of this commitment, Ameritech Ohio commissioned Wirthlin Worldwide to conduct qualitative and quantitative studies to determine the various causes of non-telephone households in Ameritech Ohio's current service territory. The studies enabled identification of potential short and long-term practices and policies designed to decrease the number of non-telephone households in Ameritech Ohio's current service territory and to maximize the reach of Ameritech Ohio's existing lifeline program in the state of Ohio. In fulfillment of the reporting requirement quoted above, Ameritech Ohio files this report with the Commission indicating those practices or policies it has elected to implement.

## **II. Background**

Ameritech Ohio's USA program was initiated under its Alternative Regulation Plan (Exhibit G), adopted by the Commission on November 23, 1994, in Case No. 93-487-TP-ALT. That plan sets forth the eligibility criteria and the applicable rates for eligible services. In addition, the plan established an advisory committee, consisting of consumer and low-income representatives and the Staff. In a settlement agreement dated May 22, 1996, in Case No. 96-532-TP-UNC, Ameritech Ohio agreed to fund a plan in the amount of \$122,000 per year to enhance its USA program. Further, as part of the merger stipulation in the above-captioned case, Ameritech/SBC committed to continuing the USA program, as described in the Company's Alternative Regulation Plan, until January 9, 2002. In the stipulation that extended Ameritech Ohio's Alternative Regulation Plan, dated March 27, 2000, the USA program was extended until

July 8, 2003. In addition, in that stipulation the Company committed to increasing the promotional budget for the USA program from \$122,000 to \$276,000 per year for 2001 and 2002.

Ameritech Ohio, in conjunction with the Commission Staff, the Ohio Consumers' Counsel, The Edgemont Neighborhood Coalition, and Parkview Area Wide Seniors, Inc. mutually selected and contracted with Wirthlin Worldwide and Patricia D. Rossi (through Wirthlin) to conduct the research as required by the Stipulation. Wirthlin's studies are attached hereto as Exhibit A (the quantitative study) and Exhibit B (the qualitative study).

Focus groups were held in Cleveland as well as some one-on-one interviews with customers in rural areas. Wirthlin followed those interviews up with quantitative and qualitative research directed at Ohio citizens who did not have landline telephone service. The research results were shared with the parties beginning in December 2000. After that time, several meetings were held among the participants to discuss the research results. After fully considering the short-term and long-term recommendations, Ameritech Ohio reports to the Commission as to the practices or policies it plans to implement. This report provides some background on the recommendations that will be adopted and the manner in which the Company plans to adopt them.

### **III. Ameritech Ohio will take steps to increase lifeline awareness**

The studies that have been conducted have shown that, in general, there is a relatively low awareness about the availability of subsidized telephone service in Ohio. Only 14% of the base were aware of USA Plan #1 and 10% were aware of USA Plan #2 (the federal lifeline program). Based on these figures, Ameritech Ohio believes that it needs to increase the awareness of the USA program.

**A. Ameritech Ohio will expand the outreach program promoting the USA Plan**  
**Ameritech Ohio has expanded the outreach program by allocating \$120,000 of the**

\$276,000 allocated to the USA program to be given to qualified outreach organizations. This is an increase of 300% over last year, when \$40,000 was given out to organizations. In addition, the Company will utilize its existing External Relations team and its resources to further extend its state-wide outreach activities by working with targeted groups, churches, and social service agencies. The External Relations team is committed to offering lifeline speaking/training sessions explaining the service to frontline associates in targeted social service agencies twice each year.

Ameritech Ohio is committed to continuing improvement of the outreach program and ensuring that the individual organizations are accountable. Ameritech Ohio believes that the organizations that are approved to perform the outreach function should be different year over year to reach a diverse group of customers. The approved organizations should demonstrate that they are meeting with the potentially qualified customer base and that they use the outreach funds efficiently and effectively. Currently the USA Advisory Board solicits RFPs from various organizations. The Board then conducts an open vote to select the organizations that will be approved and funded. The Company recommends that this procedure be replaced with a closed/blind and confidential vote so that board members do not feel any pressure to approve organizations that are represented on the board or any other pressure they might feel in an open vote. Ameritech Ohio would then make the final decision as to what organizations will be approved for outreach.



**B. Ameritech will enhance its media plan for USA**

The Company has implemented a USA-specific media plan. This plan uses census data to determine target markets that have the largest concentration of potentially qualified lifeline customers. Ameritech Ohio has allocated \$126,452 of the \$276,000 allocated to the USA program to this media effort.

The Company has worked closely with an advertising agency to determine what would be the most effective way to get the message to as many potentially qualified customers as possible. Customers in the quantitative research said the best way to reach them with the lifeline message is via mail (42%), television/radio (32%), fliers delivered to the home (23%), newspapers (23%), and social service agencies (20%). After studying census data in great detail, the agency found that the largest population group of potentially qualified customers is African -American. These customers tend to be concentrated in the six metropolitan areas in the state.

Based on the findings of the research, the agency recommended that radio be used as the medium to reach as many of these customers as possible and that the radio ads be purchased to skew toward African-American listeners. Radio is the most cost efficient way of reaching this market since there are a number of radio stations that are targeted toward varying age groups of African Americans. Moreover, indigent consumers are more apt to have access to a radio at all times, versus a television.

**C. Ameritech Ohio will address public misconceptions about establishing telephone service and the USA program**

One of the findings of the research is that one-third of the survey participants identified installation charges and deposits as a barrier to obtaining telephone service. The inability to afford the installation charges or a deposit was cited as the leading reason for not having a phone.

The USA program addresses both of these concerns, because installation charges are waived and no deposit is required. There is also a misconception of the cost of basic local telephone service. The study revealed that consumers believe that the monthly charge for phone service is more than it actually is. Thus, it appears that there is a need for additional communication of the specific benefits of the USA program to the target audiences.

The USA vendor and the Ameritech service representatives will have updated call flow documents, including an on-line job aid, that emphasize the installation charge waiver and clearly state that a deposit is not required for USA subscribers. In addition, the radio ad that is being developed also places a strong emphasis on the fact that 100% of the installation charges are waived and there are no deposit requirements. The fliers that are used for outreach and handed out at various locations are also being updated to incorporate this information more clearly. These steps will help insure that there is greater public awareness of the lifeline plans and the specific benefits that are available to subscribers and potential subscribers under the plans.

In addition, Ameritech Ohio will address the financial barriers to USA program enrollment, both real and perceived. The studies also found that 24% of customers say the cost to make or receive long distance calls is too expensive and is a perceived reason for not having telephone service. In response to this specific concern, the Company will continue to advise potential USA program customers of the availability of free toll restriction service for lifeline customers. The Company changed its USA program to put a greater emphasis on the fact that toll restriction and 900/976 call blocking are available, the benefits of these features, and the fact that they are free to lifeline customers.

**IV. Ameritech will address the reconnection issues that have been identified**

The studies also showed that former customers who still owe money on their previous telephone service are the ones who are most interested in reestablishing service. However, those that owe money on previous service see that as a barrier to reestablishing service.

**A. The availability of payment plans for prior debt**

The studies showed that interest in reconnecting is twice as high among consumers who have past due bills. (58% vs. 29% for consumers that do not owe anything). Consumers with balances need to be made aware of the payment options and payment requirements in order to expedite reinstatement of their phone service. In order to ensure that customers clearly understand that only the deniable/local portion of the bill has to be paid in order to reconnect local service, and that payment arrangements are available, the advertising pieces and radio piece have been modified to place a greater emphasis on the availability of payment options.

"Final bill" customers (those who have final bills on disconnected service) will be notified about USA and the availability of payment arrangements via the first collection letter that is mailed to them. On average, customers should be receiving this notice within 8-10 days of having a final bill. June 1, 2001 is the target date for this letter. In addition, the Company will consider including the USA program flier in the pre-collection letter as well, in an effort to obtain greater readership of the lifeline information. Ameritech Ohio suggests that funding for this insert should come out of the annual USA program budget.

Ameritech Ohio will also continue on-going training and monitoring in the credit and collections channels to assist in identifying eligible customers and to alert them to the availability of lifeline options. In addition, the Company will continue to work with an ethnically diverse

*group of outreach organizations, ensuring that they are sharing the availability of payment options with their clients.*

**B. Addressing other financial issues**

Another finding of the study is that non-Caucasians are more likely to identify financial reasons for not reconnecting their telephone service. The study found that non-Caucasians are significantly more likely than Caucasians to have difficulty paying off telephone bill debts (49% vs. 38%) or to state that they do not have the money or cannot afford the service (46% vs. 29%). The radio ad that is skewed towards African Americans has been modified to include information about payment options to help customers understand that they can obtain deferred payment arrangements on previous final bills.

**V. Long-term commitment**

Ameritech Ohio is willing to consider implementing automatic enrollment for USA Plan #2. However, in light of staff's proposed changes to the structure of the lifeline program in Case No. 00-1532-TP-COI, Ameritech Ohio intends to wait until the final outcome of that rulemaking docket before it makes such a commitment.

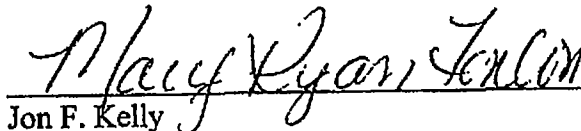
## VI. Conclusion

The company believes that the existing USA lifeline plans are comprehensive, fair and responsive to the needs of its customers and potential customers. The strength of the plans as they exist is demonstrated by the fact that the Ameritech Ohio lifeline plan was selected as the model lifeline plan, to be offered in all 13 SBC states, as a condition of the Ameritech/SBC merger. There is, however, room for improvement in how this plan is shared with Ohio customers and the Company looks forward to working with the Commission, its Staff, and other interested parties in implementing the practices and policies that it has identified in this report and analyzing results from 2001 to determine the most effective allocation of funds for the 2002 USA plan budget.

Respectfully submitted,

AMERITECH OHIO

By:



Jon F. Kelly

Mary Ryan Fenlon

Ameritech

150 E. Gay St., Rm. 4-C

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(614) 223-3302

Its Attorneys

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Report was served via first class mail, postage prepaid, on the parties listed below on this 7th day of May, 2001.



Mary Ryan Fenlon

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